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SWEET & ASSOCIATES
ATTORNEYS AT LAW

June 3, 2019

Dennis C. Sweet III *

Dennis C. Sweet IV, J.D., LL.M. *

* Licensed in Alabama, Mississippi & Washington, D.C.

* Licensed in Mississippi and Washington, D.C.

* Licensed in Mississippi only

RECEIVED

JUN 12 2019

OFFICE OF THE CITY ATTORNEY

VIA CERTIFIED MAIL

The City of Jackson
Attn: Chokwe Antar Lumumba, Mayor
Post Office Box 17
219 South President Street
Jackson, Mississippi 39205-0017



19 JUN 12 PM 2:18
RECEIVED
CITY CLERK
JACKSON, MS.

Re: Notice of Claim - Mario Clark, deceased

Dear Mayor:

Scope of Representation

This letter will serve as the official notice of a claim against The City of Jackson, Mississippi, the Jackson Police Department, all Police Officers associated with the below mentioned claims, and John Does 1-5 (members of the Jackson Police Department) in their personal and official capacities pursuant to Miss. Code Ann. § 11-46-11, 42 U.S.C. § 1983 and any other applicable state or federal statute or constitutional provision(s), and/or any applicable state or federal common law cause(s) of action.

The Time and Place the Injury Occurred

Sakinah Green has retained the law firm of Sweet & Associates on behalf of Marnasiah Clark, a minor (Mario Clark's only child). This representation arises from an incident which took place on or about February 14, 2019, in Jackson Mississippi wherein the minor child's father Mario Clark was severely injured by officers of the Jackson Police Department whereas he ultimately succumbed to his injuries on February 20, 2019.

Residence of the Person Making the Claim at the Time of the Injury

Marnasiah Clark the minor child of Mario Clark currently resides with her mother Sakinah Green in Atlanta, Georgia. At the time of the incident in question Mario Clark lived with his mother, Sheila Ragland at 2738 Pinedale Street, Jackson Mississippi.



**The Circumstances Which Brought About the Injury
The Extent of the Injury
The Names of All Persons Known to Be Involved**

Mario Clark was diagnosed with paranoid schizophrenia as a child. On February 14, he was having a schizophrenic episode, and his mother, Sheila Ragland, called police seeking assistance in transporting him to the hospital. Jackson Police Officers arrived on the scene. The officers handcuffed Mr. Clark and beat him. The officer's beating lead to Mr. Clark's death. The officers acted with reckless disregard for the safety of Mr. Clark. The officers used excessive force and violated Mr. Clark's Constitutional rights. At all pertinent times, the police officers were working within the scope of their employment with the Jackson Police Department. The City of Jackson acted with wreckless disregard in that his mother called and informed the police that her son suffered a mental illness and they failed to send persons properly trained to handle persons with mental illness.

**Types of Claims Likely to Be Made
Amount of Money Damages Sought**

Sakinah Green, on behalf of Mamasiah Clark, a minor intends to file a lawsuit in this matter pursuant to Miss. Code Ann. § 11-46-11, 42 U.S.C. § 1983 and any other applicable state or federal statute or constitutional provision. Ms. Ragland asserts the following state law claims: (i) negligence, (ii) gross negligence, (iii) civil assault, (iv) civil battery, (v) intentional infliction of emotional distress, (vi) negligent inflection of emotional distress, and (vii) reckless disregard for the rights and safety of others. Also, Ms. Ragland asserts the following federal claim: (i) 42 U.S.C. § 1983 against the City of Jackson, Mississippi; the Jackson Police Department; and John Does 1-5 (members of the Jackson Police Department) in their official capacities. The actions of the City of Jackson, the Jackson Police Department, and John Does 1-5 constituted an improper show of authority which resulted in the injuries sustained by Mr. Clark, on the day in question. Claimant seeks money damages in excess of Five Million Dollars (\$5,000,000.00) for medical expenses, pain and suffering, wrongful death, the cash value of decedent's life and expected income, and any additional damages claimants may be entitled to by law or that the Circuit Court may deem appropriate. This Notice of Claim is made pursuant to Mississippi Code Annotated § 11-46-11 (2002).

Please refer all correspondence or communication to my office relating to this claim. Should you need additional information, please contact my office.

Respectfully,

SWEET & ASSOCIATES

By: 

Dennis C. Sweet III
Dennis C. Sweet IV

cc: Jackson Police Department Chief of Police
De'keither Stamps, Jackson City Council
Aaron Banks, Jackson City Council
Kenneth I. Stokes, Jackson City Council
Ashby Foote, Jackson City Council
Virgi Lindsay, Jackson City Council
Charles Tillman, Jackson City Council
Melvin Priester, Jr, Jackson City Council